

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER HALL, individually and on behalf of all others similarly situated,

Plaintiff,

v.

FANTASIA TRADING LLC, a California limited liability company and POWER MOBILE LIFE LLC D/B/A ANKER INNOVATIONS, a Washington limited liability company,

Defendants.

Civil Action No. 1:25-cv-5505

CLASS ACTION COMPLAINT

DEMAND FOR JURY TRIAL

Plaintiff Christopher Hall (“Plaintiff”), individually and on behalf of all others similarly situated, by and through their undersigned counsel, bring this class action complaint against Defendant Power Mobile Life LLC, d/b/a Anker Innovations (the “Defendant” or “Anker”). Plaintiff alleges the following upon information and belief based on the investigation of counsel, except as to those allegations that specifically pertain to Plaintiff, which are alleged upon personal knowledge.

INTRODUCTION

1. This is a class action lawsuit against Defendants regarding the manufacture, distribution, and sale of its A1263 model Anker PowerCore 10000 power bank, the Anker Power Bank 10000 Model A1257, the Anker Power Bank 20000 Model A1647, the Anker MagGo Power Bank 10000 Model A1652, the Anker Zolo Power Bank 20000 Model A1681, and the Anker Zolo Power Bank 20000 Model A1689 (the Anker Power Bank 10000 Model A1257 is hereinafter referred to as the “Model A1263” or collectively with the Anker Power Bank 20000 Model A1647, the Anker MagGo Power Bank 10000 Model A1652, the Anker Zolo Power Bank 20000 Model A1681, the “Affected Products”).

2. Anker sold the A1263 model Anker PowerCore 10000 power bank through third parties such as Amazon, Newegg, and Ebay from June 2016 through December 2022 at an approximate retail price of \$27.00.¹

3. Anker sold some of the Affected Products internationally, including in the United Kingdom and China.

4. Plaintiff and other consumers had a reasonable expectation that the Affected Products would not overheat, explode, or be a danger to themselves or others.

5. Anker advertises that safety is something it takes seriously. On its website, Anker proclaims that: “At Anker, we take safety seriously. We know exceptional safety requires keen attention to detail and a plan for anything that could go wrong. Our leading development teams have painstakingly researched the safety concerns afflicting other chargers and used this

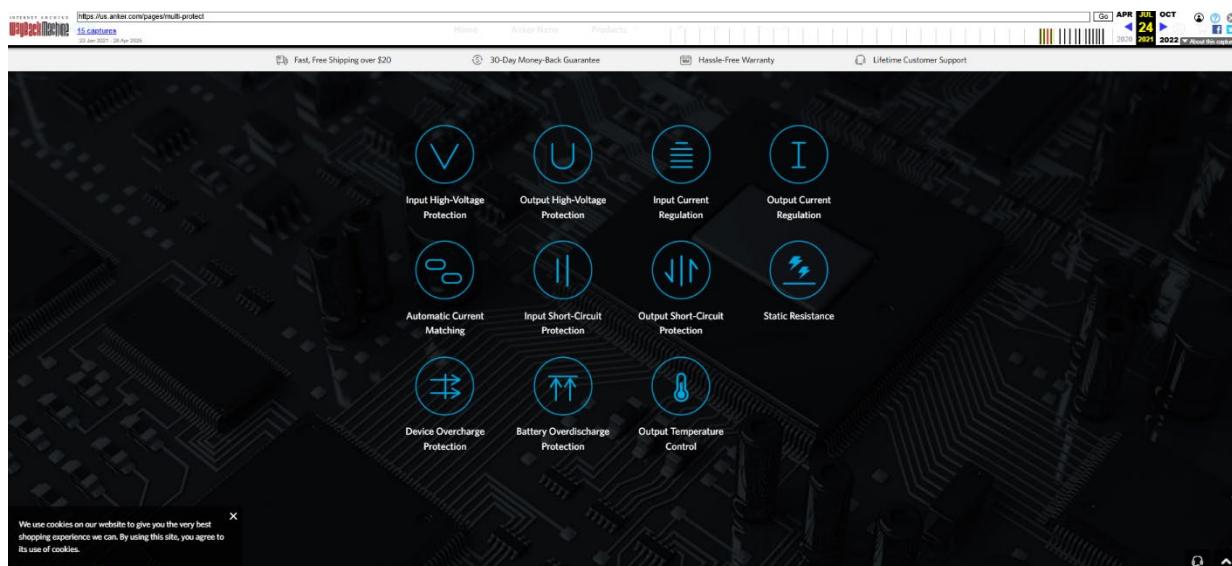


Figure 1: Anker's Website From the Wayback Machine on July 24, 2021 advertising that its chargers have "input-high-voltage protection, output-high-voltage protection, input and output current regulation, automatic current matching, input and output short-circuit protection, static resistance, device over-charge protection, battery over-discharge protection, and output-temperature control."

¹ U.S. Consumer Prod. Safety Comm'n, *More than One Million Anker Power Banks Recalled Due to Fire and Burn Hazards; Manufactured by Anker Innovations*, <https://www.cpsc.gov/Recalls/2025/More-than-One-Million-Anker-Power-Banks-Recalled-Due-to-Fire-and-Burn-Hazards-Manufactured-by-Anker-Innovations> (last visited June 18, 2025)

knowledge to develop our comprehensive MultiProtect systems, which range from static resistance to output current regulation. MultiProtect's systems are integrated into virtually all of our chargers, providing our users with unmatched peace of mind.”²

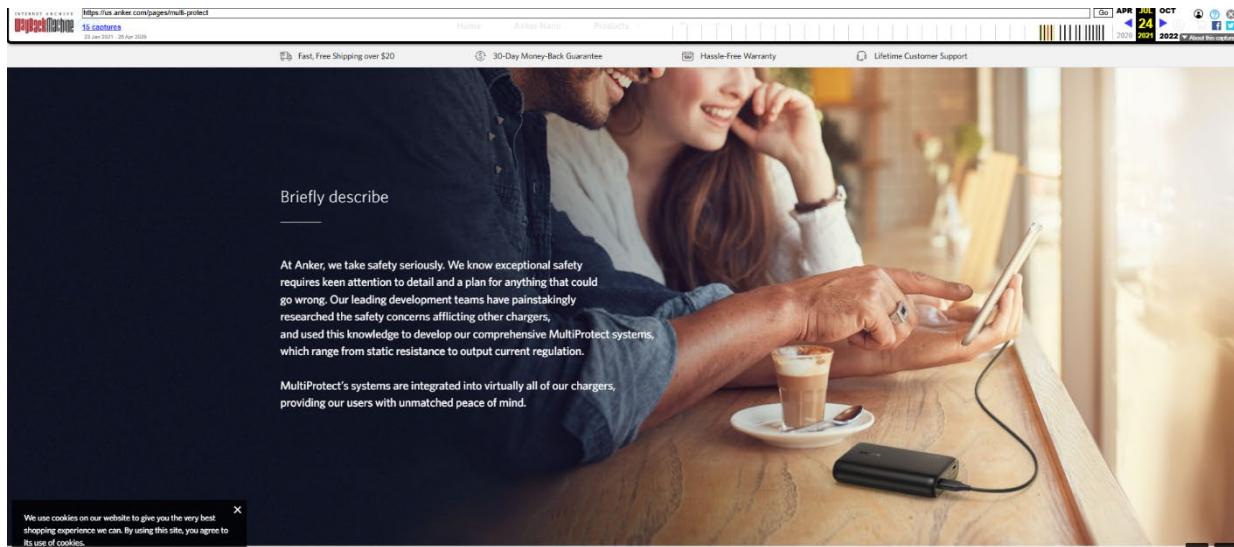


Figure 2: Anker's Website From the Wayback Machine on July 24, 2021 advertising that its chargers are safe because “At Anker, we take safety seriously. We know exceptional safety requires keen attention to detail and a plan for anything that could go wrong. Our leading development teams have painstakingly researched the safety concerns afflicting other chargers, and used this knowledge to develop our comprehensive MultiProtect systems, which range from static resistance to output current regulation. MultiProtect's systems are integrated into virtually all of our chargers, providing our users with unmatched peace of mind.”

6. Those representations about safety were false and misleading, and the Affected Products, by Anker's own admission, are not safe.

7. On June 25, 2025, Anker implemented a recall announcing that the Model A1263 is not safe. It wrote on its website that “We have identified that certain Anker PowerCore 10000 power banks (Model: A1263) manufactured between January 1st, 2016 and October 30th, 2019 (which were sold between June 1st, 2016 and December 31st, 2022 only in the United States) may pose a fire safety risk due to a potential issue with the lithium-ion battery. This issue can cause the

² Anker Innovations Tech. Co., Ltd., *MultiProtect—The Ultimate Safety Package*, <https://us.anker.com/pages/multi-protect> (last visited June 18, 2025).

battery to overheat, leading to melting of plastic components, smoke, and fire hazards.”³

8. On or around June 30, 2025, Anker announced a voluntary recall of five more power banks: the Anker Power Bank 10000 Model A1257, the Anker Power Bank 20000 Model A1647, the Anker MagGo Power Bank 10000 Model A1652, the Anker Zolo Power Bank 20000 Model A1681, and the Anker Zolo Power Bank 20000 Model A1689.⁴

9. On or around June 20, 2025, Anker has issued a recall of several models of its power banks in China, citing safety risks. The seven listed models include the 10,000 mAh Magnetic Power Bank (A1642), Anker 335 Power Bank (A1647), Anker Zolo Travel Power Bank (A1680, A1681), as well as models A1257, A1689, and A1652.⁵

10. On or around June 2025, Anker issued a recall in the United Kingdom of some of its power banks, including the Anker Zolo Power Bank 20000 Model A1689, Anker Power Bank (20,000mAh, 22.5W, Built-In USB-C Cable) — Model A1647, Anker Zolo Power Bank (20K, 30W, Built-In USB-C and Lightning Cable) — Model A168, and Anker Zolo Power Bank (20K, 30W, Built-In USB-C Cable) — Model A1689.⁶

11. On or around June 2025, Anker issued a recall in Australia of some of its power banks, including the Anker Power Bank (10K, 22.5W) — Model A1257, Anker Power Bank (20,000mAh, 22.5W, Built-In USB-C Cable) — Model A1647, Anker Zolo Power Bank (20K,

³ Anker Innovations Tech. Co., Ltd., *Anker Innovations Recalls Anker PowerCore 10000 Power Bank (Model A1263)*, <https://www.anker.com/a1263-recall> (last visited June 18, 2025).

⁴ Anker Innovations, *Anker Innovations Initiates Global Voluntary Recall for Selected Power Banks*, ANKER (last visited July 1, 2025), https://www.anker.com/rc2506?ranMID=43469&ranEAID=TnL5HPStwNw&utm_source=rakuten&utm_medium=affiliate&utm_content=1_2116208_Skimlinks.com&utm_campaign=TnL5HPStwNw&ranSiteID=TnL5HPStwNw-pjj3dW7Sz6yyGIwIKfsEA

⁵ Ricci Rox, *Anker, Romoss & Baseus Face Massive Power Bank Recalls Over “Safety Risks,”* NOTEBOOKCHECK (June 22, 2025), <https://www.notebookcheck.net/Anker-Romoss-Baseus-face-massive-power-bank-recalls-over-safety-risks.1041335.0.html>

⁶ Anker Innovations, *Anker Innovations Initiates Global Voluntary Recall for Select Power Banks*, ANKER UK (last visited July 1, 2025), <https://www.anker.com/uk/rc2506>

30W, Built-In USB-C and Lightning Cable) — Model A1681, Anker Zolo Power Bank (20K, 30W, Built-In USB-C Cable) — Model A1689⁷

12. Accordingly, Plaintiff brings this action individually and on behalf of a Class of similarly situated individuals for equitable relief and to recover damages and restitution for: (i) violations of New York General Business Law (“GBL”) §§ 349 and 350, et seq., and (ii) unjust enrichment.

PARTIES

13. Plaintiff Christopher Hall is a citizen of New York, New York and owns the Model A1263. The serial number is difficult to read, and he has confirmed that the device matches the recalled model and received an Amazon recall notice letter. Mr. Hall purchased the power bank several years ago from Amazon and routinely carries it in his bag when he leaves home. He is concerned that he may have narrowly avoided a hazardous event, and remains apprehensive that the device could overheat without warning. He relied on Anker’s reputation for safety and quality when making his purchase and now fears the product could cause harm to himself and/or others.

14. Fantasia Trading LLC is a Delaware corporation with its principal place of business located at 5350 Ontario Mills Parkway, Ontario, California. Fantasia Trading LLC is Anker Innovation’s wholly owned subsidiary. Fantasia Trading LLC’s activities are under the control and direction of its parent Anker Innovations. At all relevant times hereto, Fantasia Trading LLC marketed, distributed, advertised, warranted, and sold the Affected Products through the United States, including in Washington.

15. Anker Innovations is a Chinese electronics manufacturer that focuses on smart devices used for entertainment, travel, and smart homes, and is centered around four key brands:

⁷ Anker Innovations, *Anker Innovations Initiates Global Voluntary Recall for Select Power Banks*, ANKER AU (last visited July 1, 2025), <https://www.anker.com/au/rc2506>

Anker, Soundcore, eufy, and Nebula.⁸ Upon information and belief, in the United States, Anker Innovations operates in the U.S. under Power Mobile Life LLC d/b/a Anker Innovations, a Washington limited liability company (“Anker Innovations”), headquartered in in Bellevue, Washington.⁹

16. Defendants created and/or authorized the false and misleading advertising and labeling of the Affected Products.

JURISDICTION AND VENUE

17. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(d) because there are more than 100 Class members; the aggregate amount in controversy exceeds \$5,000,000.00, exclusive of interest, fees, and costs; and at least one Class member is a citizen of a state different from the Defendant.

18. This Court has personal jurisdiction over Defendant Anker Innovations because Defendant purposefully marketed, advertised, and sold the Affected Products to consumers, including Plaintiff, within this forum state. Defendant thereby established sufficient minimum contacts by directing its commercial activities into the state and engaging in transactions that form the basis of Plaintiff’s claim. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because Plaintiff resides in this District, and suffered the alleged harm here.

FACTUAL ALLEGATIONS

A. Defendants Manufacture, Distribute, Market, and Sold the Affected Products

19. Defendants manufactured, distributed, marketed, and sold the Affected Products. The Affected Products were specifically marketed as a safe product that will serve as a power

⁸ *About*, ANKER, <https://us.anker.com/pages/storefront-about> (last visited July. 2, 2025).

⁹ *Anker Innovations LinkedIn page*, <https://www.linkedin.com/company/ankerinnovations> (last visited July. 2, 2025).

bank.

20. Defendants engaged in marketing efforts to persuade consumers on the benefits of safety. Defendants advertised and warranted that the Affected Products “ensures complete safety for all your devices and most importantly, you.”¹⁰

21. Defendants utilized third parties, such as Amazon, Newegg, and Ebay to help distribute, market, and sell the Affected Products.¹¹

22. Defendants sold the Affected Products through their website at Anker.com, as shown through screenshots of Model A1263 in *Figure 3* and *Figure 4*, below:

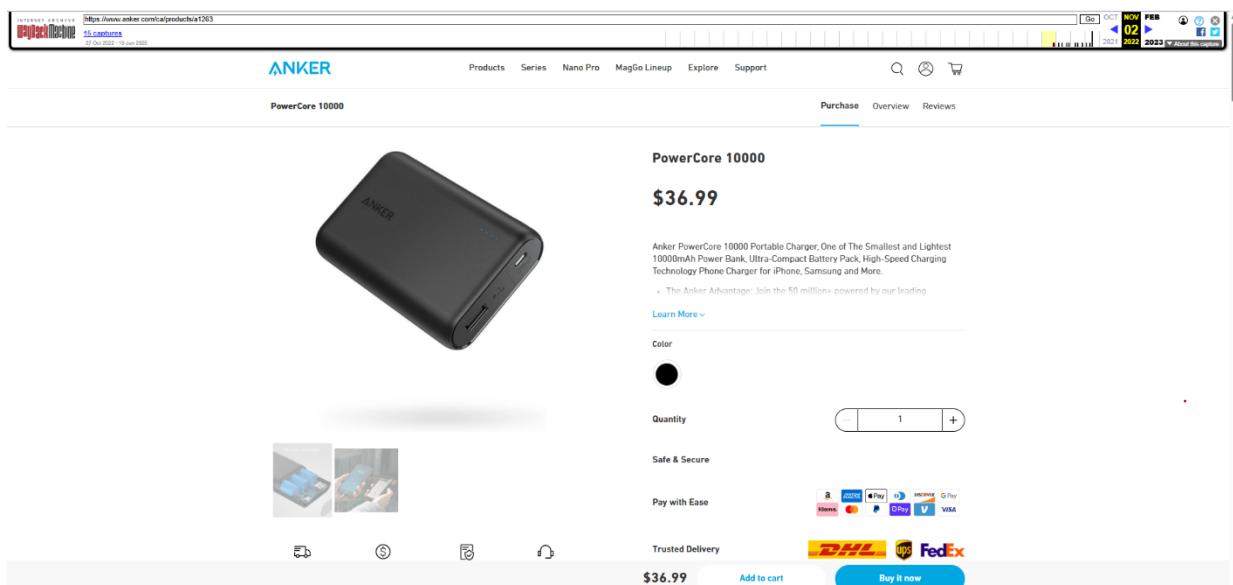


Figure 3: Wayback Machine capture dated Nov. 2, 2022 of Anker’s product page for the PowerCore 10000 (model A1263) listing the portable charger at \$36.99.

¹⁰ Anker Innovations Tech. Co., Ltd., *MultiProtect—The Ultimate Safety Package*, <https://us.anker.com/pages/multi-protect> (last visited June 18, 2025).

¹¹ U.S. Consumer Prod. Safety Comm’n, *More than One Million Anker Power Banks Recalled Due to Fire and Burn Hazards; Manufactured by Anker Innovations*, <https://www.cpsc.gov/Recalls/2025/More-than-One-Million-Anker-Power-Banks-Recalled-Due-to-Fire-and-Burn-Hazards-Manufactured-by-Anker-Innovations> (last visited June 18, 2025)

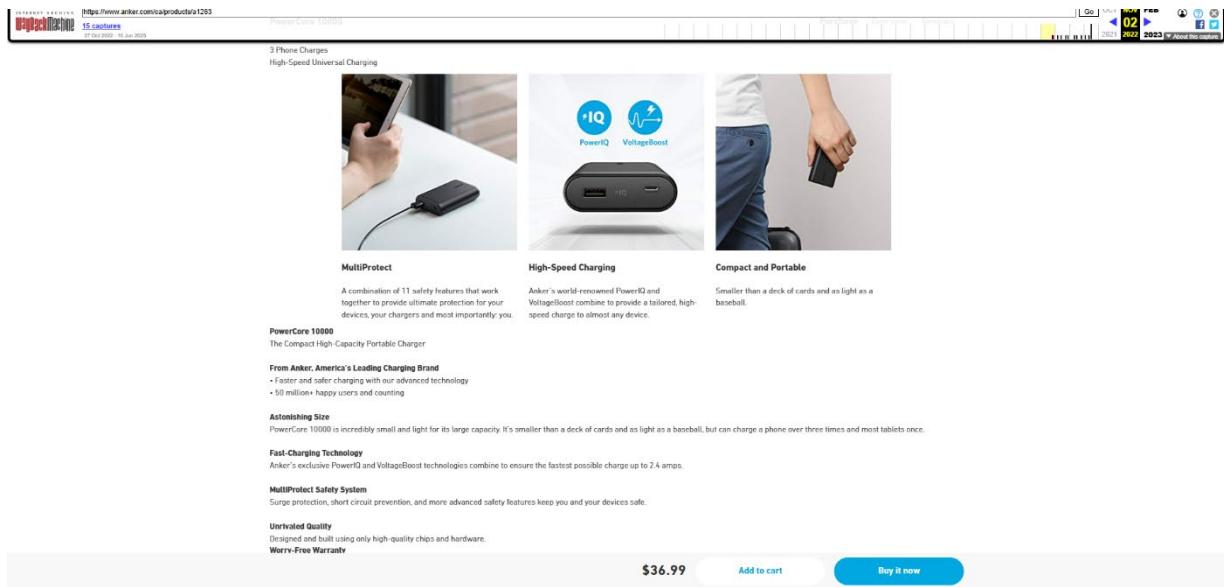


Figure 4: Wayback Machine capture dated Nov. 2 2022 of Anker's PowerCore 10000 (model A1263) product page. The archived copy advertises that the unit's "MultiProtect" safety suite combines separate safeguards, promises "faster and safer charging with our advanced technology," and touts a "MultiProtect Safety System" providing surge protection, short-circuit prevention, and other advanced measures to keep users and devices safe.

23. When purchasing the Affected Products on Anker's website, there is an "EU Declaration of Conformity." On it, it cited Anker as the Manufacturer, as shown in *Figure 5*, below:

EU Declaration of Conformity

Version V1.0

Name of the Manufacturer	Anker Innovations Limited
Address of the Manufacturer	Room 1318-19, Hollywood Plaza, 610 Nathan Road, Mongkok, Kowloon, Hong Kong
Name of the Product	PowerCore 10000
Trade Mark	ANKER
Mode No.	A1263

Figure 5 - Declaration of Conformity" (Version V1.0) identifying Anker Innovations Ltd., Room 1318-19, Hollywood Plaza, 610 Nathan Road, Mongkok, Kowloon, Hong Kong, as manufacturer of the Model A1263.)

B. Defendants' Use Of Unsafe Lithium-Ion Battery Cells In The Affected Products.

24. Defendants use Lithium-ion battery cells in the Affected Products.

25. Lithium-ion cells produce power by shuttling lithium ions from the anode to the cathode through an electrolyte, while electrons move through the external circuit to run the device.¹²

26. Thermal runaway is the principal safety hazard with lithium-ion batteries: once a cell generates heat faster than it can dissipate it, temperature rises precipitously, exothermic reactions accelerate, and the self-sustaining cycle can end in venting, fire, or explosion.¹³

27. Explosions from Lithium-ion cell batteries are common. Vistra's Moss Landing battery-storage plant ignited on January 17, 2025, prompting 1,500 evacuations and renewed scrutiny of thermal-runaway risks.¹⁴

28. In 2024 alone, New York City logged six lithium-battery fire deaths in 2024, with 277 injuries.¹⁵

¹² Univ. of Wash. Clean Energy Inst., *Lithium-Ion Battery—What Is a Lithium-Ion Battery and How Does It Work?* (n.d.), <https://www.cei.washington.edu/research/energy-storage/lithium-ion-battery/> (last visited June 18, 2025)

¹³ Nat'l Fire Sprinkler Ass'n, *Lithium-Ion Battery Fires and Fire Protection* (Jan. 12, 2023), <https://nfsa.org/2023/01/12/lithium-ion-battery-fires/> (last visited June 18, 2025)

¹⁴ Robert Mackey, *Fire Reignites at California Battery Plant After Evacuations Amid Toxic Smoke*, The Guardian (Jan. 17, 2025), <https://www.theguardian.com/us-news/2025/jan/17/california-battery-plant-fire-monterey> (last visited June 18, 2025).

¹⁵ Giulia Heyward, *FDNY Reports 67% Drop in Lithium-Ion Battery Deaths in 2024*, Gothamist (Jan. 8, 2025), <https://gothamist.com/news/fdny-reports-67-drop-in-lithium-ion-battery-deaths-in-2024> (last visited June 18, 2025).



Figure 6 A fire in a truck caused by a Lithium-ion battery¹⁶

C. Defendant's False and Misleading Advertising Campaign to Promote Safety and Induce Consumers to Purchase the Affected Products

29. Consumers looking to battery power bank options are faced with various choices and features, including whether to pay more for a battery power bank with safety features or less without safety features.¹⁷

30. As shown in *Figure 1* and *Figure 2* above, when it sold the Affected Products, Anker advertised and emphasized its commitment to safety. It Advertised on its Website, that “exceptional safety requires keen attention to detail and a plan for anything that could go wrong. Our leading development teams have painstakingly researched the safety concerns afflicting other chargers, and used this knowledge to develop our comprehensive MultiProtect systems, which range from static resistance to output current regulation. MultiProtect’s systems are integrated into

¹⁶ Emily Baker, *Lithium-ion batteries caused more than 1,000 fires during the past year in Australia*, ABC News (Austl.) (Mar. 13, 2024), <https://www.abc.net.au/news/2024-03-13/lithium-ion-fires-recycling-plants-trucks-vapes-exploding/103582110> (last visited June 18, 2025)

¹⁷ Matt Stevens, *Killer chargers, travel adaptors and power banks rife on online marketplaces*, Which?, Sept. 2, 2019), <https://www.which.co.uk/news/article/killer-chargers-travel-adaptors-and-power-banks-rife-on-online-marketplaces-aJtUU8K0Mfyx> (last visited June 18, 2025).

virtually all of our chargers, providing our users with unmatched peace of mind.”¹⁸

31. Third party testers of products used to power electronic devices confirm that “Online marketplaces that list cheap and unsafe electrical products sold by unknown brands are putting people at risk. These products might be cheap but our testing shows they have the potential to cause serious damage or injury, including electric shocks and fires.”¹⁹

32. Cheaper options for battery banks can easily be found by searching for “power bank” on Amazon.com, but they do not necessarily market that they have safety features. In contrast, Anker sells its products for more money given their promised safety features, as shown in *Figure 7* below.

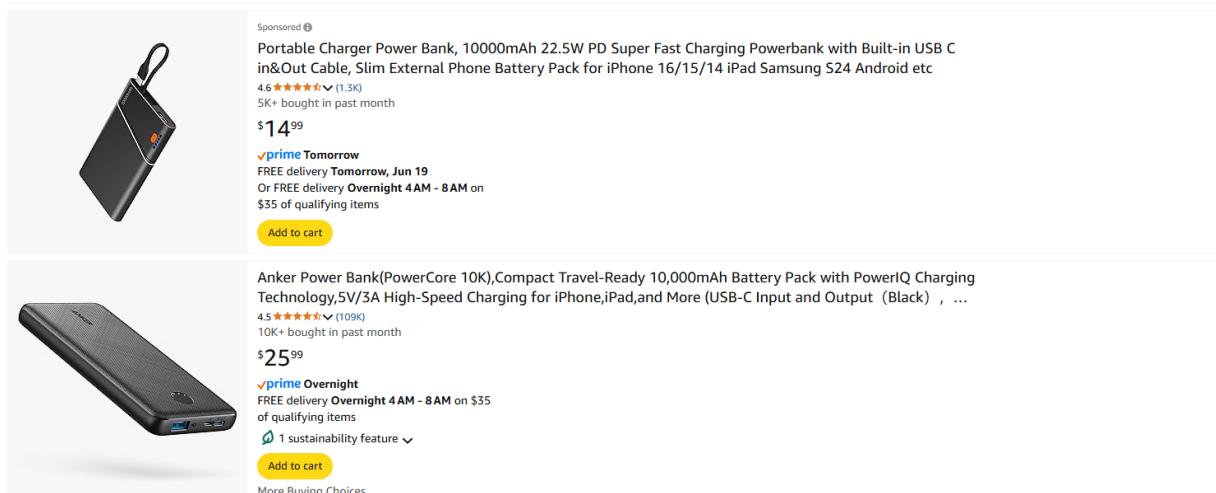


Figure 7 Screenshot of Amazon search results for “power bank” showing Amazon listings for 10,000mAh power banks generic fast-charging unit priced at \$14.99 above an Anker PowerCore 10K listed at \$25.99. The price premium reflects Anker’s established reputation for including protective circuitry and undergoing safety certification—factors often absent in lower-cost, unbranded alternatives.

¹⁸ Anker Innovations Tech. Co., Ltd., *MultiProtect—The Ultimate Safety Package*, <https://us.anker.com/pages/multi-protect> (last visited June 18, 2025).

¹⁹ Matt Stevens, *Killer chargers, travel adaptors and power banks rife on online marketplaces*, Which?, Sept. 2, 2019, <https://www.which.co.uk/news/article/killer-chargers-travel-adaptors-and-power-banks-rife-on-online-marketplaces-aJtUU8K0Mfyx> (last visited June 18, 2025).

33. On the EU Declaration of Conformity, Anker, through its designated agent, Louis Qi, “represent[s] and warrant that: (i) I am a designated person of the manufacturer, (ii) I am responsible for the regulatory compliance of the product (including with the requirements mentioned in Anker Innovations Limited and this Declaration of Conformity) and (iii) the information I have provided in support of the safety and effectiveness of the product to be true and accurate and do not contain any material omissions.”

I represent and warrant that: (i) I am a designated person of the manufacturer, (ii) I am responsible for the regulatory compliance of the product (including with the requirements mentioned in Anker Innovations Limited and this Declaration of Conformity) and (iii) the information I have provided in support of the safety and effectiveness of the product to be true and accurate and do not contain any material omissions.

Title:	Compliance Manager	Function:	Compliance
Name:	Louis Qi	Date:	2018-09-18
City:	Shenzhen	Signature:	

Figure 8 Excerpt from Anker’s EU Declaration of Conformity for the PowerCore 10000 (Model A1263): Compliance Manager Louis Qi, based in Shenzhen, affirms responsibility for the product’s regulatory compliance and the accuracy of supporting safety information by writing “I represent and warrant that: (i) I am a designated person of the manufacturer, (ii) I am responsible for the regulatory compliance of the product (including with the requirements mentioned in Anker Innovations Limited and this Declaration of Conformity) and (iii) the information I have provided in support of the safety and effectiveness of the product to be true and accurate and do not contain any material omissions.”; signed and dated 18 Sept 2018.

34. Defendants positioned themselves in the marketplace as a premium and safe alternative to the flood of low-cost, uncertified battery power banks sold by unknown brands online. By advertising its “MultiProtect” safety system and leveraging certifications such as its EU Declaration of Conformity, Anker explicitly marketed its products as safer and more reliable than less expensive competitors. This messaging was central to its appeal and allowed Anker to command a price premium across major e-commerce platforms, such as Amazon.

35. Consumers reasonably relied on Anker’s representations that its products incorporated robust safety features and met rigorous safety standards. In particular, Anker’s use of official declarations, including the representation by its Compliance Manager that the PowerCore

10000 complied with regulatory safety requirements, reinforced the perception that the product was engineered and vetted for consumer safety.

36. As a result, consumers—including Plaintiff—were induced to pay more for the Affected Products based on Anker’s assurances of quality and protection. Anker’s conduct shaped consumer decision-making by creating the false impression that its products were meaningfully safer than low-cost alternatives, when in fact the PowerCore 10000 was not safe, as confirmed by the nationwide recall implemented due to severe safety risks, including overheating and fire.

D. Consumers Have Been Harmed By Defendants’ False and Misleading Representations

37. Defendants knew, or should have known, that the advertising and labeling claims made on the Affected Products are false and misleading.

38. Defendants sold products that have been subject to nationwide recalls prior to the one that is the subject of this complaint.

39. This includes in June 2024 the Anker Innovations Recalls Anker 321 Power Bank (PowerCore 5K, Black) A1112²⁰ which was recalled because it “may pose a fire safety risk due to a manufacturing defect.”²⁰

40. This also includes in March 2023, Anker recalled its 535 Power Bank (PowerCore 20k) citing that “the lithium-ion batteries in the recalled power banks can overheat, posing a fire hazard.”²¹

41. This also includes in October 2024, Anker recalled its Anker Power Banks with model numbers A1642, A1647 and A1652 because “The lithium-ion battery in the power banks

²⁰ Anker 321 Power Bank (PowerCore 5K, Black) A1112 Recall, ANKER, <https://www.anker.com/a1112-recall/> (last visited June 18, 2025).

²¹ U.S. Consumer Prod. Safety Comm’n, *Fantasia Trading Recalls Anker Power Banks Due to Fire Hazard*, CSPC.GOV (2023), <https://www.cpsc.gov/Recalls/2023/Fantasia-Trading-Recalls-Anker-Power-Banks-Due-to-Fire-Hazard/> (last visited June 18, 2025).

can overheat, posing fire and burn hazards.”²²

42. Defendants knew, or should have known, that their products may not actually be safe given the three (3) product recalls they have issued in the last two years prior to the one that occurred in June of 2025.

43. Defendants knew, or should have known, that the advertising for the Affected Products misrepresented material facts concerning safety.

44. Defendants knew, or should have known, that the representations and statements made through its labeling and advertising would mislead consumers to purchase the Affected Products instead of competitors’ cheaper products based on a false belief that the Affected Products were safer.

45. Had Defendants disclosed the true risks of the Affected Products, Plaintiff would not have purchased the Affected Products, or would have paid less for it, had the Affected Products been truthfully and accurately labeled.

E. The Affected Products Have Been the Subject of a Global Recall

46. On June 12, 2025, Anker announced a recall of approximately 1,158,000 PowerCore 10000 power banks (Model A1263) manufactured between January 2016 and October 2019.²³ The recall followed at least 19 reported incidents of fires or explosions, including two cases of consumer burn injuries and over \$60,000 in documented property damage. The U.S. Consumer Product Safety Commission concluded that the lithium-ion batteries in these units posed a significant risk of overheating, fire, and burn hazards.

²² U.S. Consumer Prod. Safety Comm’n, *Anker Power Banks Recalled Due to Fire and Burn Hazards; Manufactured by Anker Innovations*, CPSC.GOV (2024), <https://www.cpsc.gov/Recalls/2025/Anker-Power-Banks-Recalled-Due-to-Fire-and-Burn-Hazards-Manufactured-by-Anker-Innovations/> (last visited June 18, 2025).

²³ U.S. Consumer Product Safety Comm’n, *More than One Million Anker Power Banks Recalled Due to Fire and Burn Hazards; Manufactured by Anker Innovations*, CPSC.GOV (2025), <https://www.cpsc.gov/Recalls/2025/More-than-One-Million-Anker-Power-Banks-Recalled-Due-to-Fire-and-Burn-Hazards-Manufactured-by-Anker-Innovations/> (Last visited June 18, 2025).

47. On June 2025, Anker issued recalls of lithium ion battery power banks internationally, including in China,²⁴ the United Kingdom,²⁵ and in Australia.²⁶

48. China also recalled some of the Affected Products due to their danger they posed. On June 28, 2025. The Civil Aviation Administration of China banned some of the Affected Products from being brought on airplanes due to their dangerous qualities.²⁷

49. In China, Anker has offered 100 times compensation plan that includes a full refund for any of the products that were affected by the Chinese recall, as shown in *Figure 8* below.²⁸ This option for a full refund was not offered to American consumers.

²⁴ ChinaTravelNews, *China bans power banks without 3C certification on domestic flights*, CHINATRAVELNEWS (June 30, 2025), <https://www.chinatravelnews.com/article/187508>

²⁵ Anker Innovations, *Anker Innovations Initiates Global Voluntary Recall for Select Power Banks*, ANKER UK (last visited July 1, 2025), <https://www.anker.com/uk/rc2506>

²⁶ Anker Innovations, *Anker Innovations Initiates Global Voluntary Recall for Select Power Banks*, ANKER AU (last visited July 1, 2025), <https://www.anker.com/au/rc2506>

²⁷ ChinaTravelNews, *China bans power banks without 3C certification on domestic flights*, CHINATRAVELNEWS (June 30, 2025), <https://www.chinatravelnews.com/article/187508>

²⁸ Ricci Rox, *Anker, Romoss & Baseus Face Massive Power Bank Recalls Over “Safety Risks,”* NOTEBOOKCHECK (June 22, 2025), <https://www.notebookcheck.net/Anker-Romoss-Baseus-face-massive-power-bank-recalls-over-safety-risks.1041335.0.html>



Anker Innovations proactively recalls some batches of basic mobile power banks

Dear Anker users and partners:

We are deeply sorry to inform you that due to safety risks in some batches of basic mobile power products, Anker has proactively initiated a recall of some batches of products with model numbers A1642/A1647/A1652/A1680/A1681/A1689/A1257, which was approved by the Hunan Provincial Market Supervision and Administration Department on June 20. Users who hold the relevant products are requested to stop using them immediately.

We solemnly promise: Anker will face the problems head on, never shirk responsibility, and take prompt action.

1. Investigation of the cause of the problem: Quality issues of incoming battery cells were not identified in a timely manner.

In a recent quality and safety inspection, we found that some batches of industry-standard batteries from a supplier had unapproved raw material changes, which could cause insulation failure of the diaphragm in a very small number of products after long-term cyclic use, leading to safety hazards of overheating or even combustion. In order to eliminate potential product safety risks as soon as possible, we conducted an internal investigation, identified the risky products involved in this batch of batteries, and proactively submitted a recall application to the market supervision department.

So far, we have completed the following actions:

Remove all related models from official e-commerce platforms.

The cooperation with this supplier has been terminated and switched to other battery cell suppliers.

Prepare a proper recall solution to ensure user safety and convenience.

2. Immediately initiate the recall

1. 100-times compensation plan: Anker provides three compensation plans for users to choose from: 1) Full refund; 2) Upgrade and replacement; 3) Anker Mall voucher (original order amount + 50 yuan).

2. Recall process:

Instructions for applying for a recall: 1) Follow the "Anker After-Sales" service account on WeChat, send [Participate in the recall] and submit relevant information; 2) Send [Participate in the recall] to the customer service of the purchase platform, and the customer service will assist in the entire process; 3) Call the customer service hotline 400-055-0036, and a professional team will provide you with service; 4) Submit the application on the [Product Recall] page of [Service and Support] on the Anker Innovations official website.

Product recall method description: To ensure recycling and transportation safety, we will send special fireproof protective bags to all users who apply for recall. You can get a refund by sending it back through the designated courier. If it is inconvenient to return, you can also contact the official customer service to obtain the [self-handling] operation instructions for destruction (power banks are dangerous goods). After the destruction is completed, please report to the official customer service for record.

*Reminder: We will also proactively contact relevant purchasers through SMS, phone calls, social media, etc. Please keep in touch.

3. Long-term protection mechanism: Establish full-link battery cell monitoring capabilities and upgrade the battery safety management system

Mobile power supplies carry the daily safety of hundreds of millions of users. In addition to the related work of this recall, Anker Innovation will also establish a long-term guarantee mechanism to ensure that similar quality problems will not occur again. We will have the following core measures:

1. Control the safety of battery cell design at the source: Establish a team of battery cell safety experts, strictly control the selection of battery cell suppliers, and jointly review the safety and reliability design plan of each battery cell with suppliers to ensure that risks are eliminated at the design stage.

2. Strictly test the battery materials used in the products on sale: Establish a leading battery testing laboratory in the mobile power industry. In addition to conventional battery safety performance and white box testing, it can also conduct in-depth analysis of key battery materials such as positive electrodes, negative electrodes and separators.

3. Monitor the entire battery cell production process: Build a dedicated big data platform, connect to the production system of battery cell suppliers, obtain and analyze various data on battery cell production, and proactively discover potential problems and issue early warnings.

Anker has always put safety first. We are deeply sorry for the trouble and inconvenience caused to users by this voluntary recall. Anker faces the problem and makes serious rectifications. The voluntary recall is only the first step. We will fulfill our safety commitments with practical actions and safeguard the rights of consumers. We are also willing to work with industry partners to jointly improve the quality standards of the mobile power industry and promote high-quality development of the industry. We sincerely thank our users for their trust and supervision.

Anker Innovation Technology Co., Ltd.

June 20, 2025



Translated with Google Lens

Figure 9: Anker recall notice in China, as translated offers users full compensation of the Chinese recalled products, and reads (due to quality of the image and the nature of the translation, the text may have some inaccuracies):

Dear Anker users and partners:

We are deeply sorry to inform you that, due to safety risks in some batches of basic mobile power products, Anker has proactively initiated a recall of certain batches with model numbers A1642/A1647/A1652/A1680/A1681/A1689/A1257, approved by the Hunan Provincial Market Supervision and Administration Department on June 20. Users who hold the relevant products are requested to stop using them immediately.

We solemnly promise: Anker will face the problems head-on, never shirk responsibility, and take prompt action.

1. Investigation of the cause of the problem

Quality issues of incoming battery cells were not identified in a timely manner

Recent quality and safety inspections revealed that some batches of industry-standard batteries supplied to Anker contained unapproved raw-material changes. This could lead to insulation failure of the diaphragm in a small number of products after long-term cyclic use, posing overheating or combustion hazards. We conducted an internal investigation, identified the risky products involved in this batch of batteries, and proactively submitted a recall application to the market-supervision department.

Actions completed to date

- Removed all related models from official e-commerce platforms.
- Terminated cooperation with the supplier and switched to other battery-cell suppliers.
- Prepared a proper recall solution to ensure user safety and convenience.

2. Immediate recall measures

1. **100-times compensation plan** – Users may choose:
 - (i) Full refund;
 - (ii) Upgrade and replacement; or
 - (iii) Anker Mall voucher (original order amount + 50 yuan).
2. **Recall process**
 - Follow the “Anker After-Sales” WeChat service account, send “Participate in the recall,” and submit the required information; or
 - Send “Participate in the recall” to the customer service of the purchase platform; or
 - Call customer service at 400-055-0036; or
 - Submit the application on the “Product Recall” page under “Service and Support” on Anker’s official website.

To ensure safe transport, we will send fire-proof protective bags to all users who apply. Users may ship the product back via the designated courier for a refund. If return is inconvenient, users may contact customer service for self-disposal instructions and thereafter report completion for record.

Reminder: We will also reach out to affected purchasers via SMS, phone, social media, etc. Please stay in touch.

3. Long-term protection mechanism

Establish full-link battery-cell monitoring and upgrade the battery-safety management system

Mobile power supplies affect the daily safety of hundreds of millions of users. Beyond this recall, Anker will implement a long-term guarantee mechanism with the following measures:

1. **Source-level design control** – Build a team of battery-cell safety experts, strictly vet suppliers, and jointly review design plans to eliminate risks at the design stage.
2. **Enhanced materials testing** – Establish an industry-leading battery-testing laboratory for deep analysis of key battery materials as well as conventional safety and white-box testing.
3. **End-to-end production monitoring** – Create a big-data platform connected to suppliers’ production systems to detect potential problems early and issue warnings.

Anker has always put safety first. We apologize for the inconvenience caused by this voluntary recall. This is only the first step; we will honor our safety commitments with concrete actions and protect consumer rights. We also look forward to collaborating with industry partners to improve quality standards and promote high-quality development in the mobile-power sector. We sincerely thank our users for their trust and supervision.

safety program as providing protection from overheating and fire, even after the June recall and the numerous other recalls cited in this complaint.

51. Anker continues to claim “complete safety” and full defense against thermal runaway for its products, exploiting consumers’ understandable preference for lithium-ion devices they think they can trust.

52. Anker has offered a replacement or a \$30 Anker gift card to customers who can submit a photo of their recalled Model A1263 power bank showing the model number, serial number, their name, the date of the photograph, and the word “recalled” written on the power bank in permanent marker.²⁹ Anker has offered a replacement or a Anker gift card for the Affected Products that are not the Model A1263 but Anker has not disclosed how much the gift card would be for.³⁰

53. Anker tells consumers to enter the serial number of their Affected Products, which they admit is unclear and hard. Anker writes on their recall page to “Please carefully review the letters and numbers in your serial number, such as "1," "L," "I," "2," and "Z." Characters like "0" (zero) and "O" (letter O) are easily confused. Affected serial numbers do not contain the letters "O" or "I."³¹

54. The recall provides insufficient reimbursement for the premium prices consumers

²⁹ U.S. Consumer Product Safety Comm’n, *More than One Million Anker Power Banks Recalled Due to Fire and Burn Hazards; Manufactured by Anker Innovations*, CPSC.GOV (2025), <https://www.cpsc.gov/Recalls/2025/More-than-One-Million-Anker-Power-Banks-Recalled-Due-to-Fire-and-Burn-Hazards-Manufactured-by-Anker-Innovations/> (Last visited June 18, 2025).

³⁰ Anker Innovations, *Anker Innovations Initiates Global Voluntary Recall for Selected Power Banks*, ANKER, https://www.anker.com/rc2506?ranMID=43469&ranEAID=TnL5HPStwNw&utm_source=rakuten&utm_medium=affiliate&utm_content=1_2116208_Skimlinks.com&utm_campaign=TnL5HPStwNw&ranSiteID=TnL5HPStwNw-pj3dW7Sz6yyGIwIKfsEA (last visited July 1, 2025).

³¹ Anker Innovations, *Anker Innovations Initiates Global Voluntary Recall for Selected Power Banks*, ANKER, https://www.anker.com/rc2506?ranMID=43469&ranEAID=TnL5HPStwNw&utm_source=rakuten&utm_medium=affiliate&utm_content=1_2116208_Skimlinks.com&utm_campaign=TnL5HPStwNw&ranSiteID=TnL5HPStwNw-pj3dW7Sz6yyGIwIKfsEA (last visited July 1, 2025).

paid in reliance on Anker's misrepresentations as certain consumers may have disposed of the Affected Products given that it was dangerous. Additionally, the Recall does not give consumers the option to obtain a cash refund, instead only offering a replacement item or a gift card for \$30 from a company they may not trust anymore.

TOLLING

55. The statutes of limitations applicable to Plaintiff's and the Classes' claims were tolled by Anker's conduct and Plaintiff's and Class Members' delayed discovery of their claims.

56. As alleged above, Plaintiff and members of the Classes did not know and could not have known that the Affected Products was dangerous. Plaintiff's and members of the Classes could not have discovered Anker's unlawful conduct with reasonable diligence.

CLASS ACTION ALLEGATIONS

57. Plaintiff brings this action pursuant to Rule 23(a), (b)(2), and (b)(3) of the Federal Rules of Civil Procedure, individually and on behalf of the following Classes:

All persons who purchased one or more of Defendants' Affected Products in the United States for personal/household use within any applicable limitations period (the "Nationwide Class").

58. Plaintiff brings this action individually and on behalf of the following New York subclass:

All persons who purchased one or more of Defendant's Affected Products in the state of New York for personal/household use within any applicable limitations (the "New York Subclass").

59. Excluded from the Class and Subclass are: (1) any Judge or Magistrate presiding over this action and any members of their families; and (2) Defendants, Defendants' subsidiaries, parents, successors, predecessors, and any entities in which Defendants or their parents and any entities in which Defendants have a controlling interest and their current or former employees, officers, and directors

60. Numerosity (Rule 23(a)(1)): The exact number of members of the Class is unknown and currently unavailable to Plaintiff, but joinder of individual members herein is impractical. The Class is likely comprised of thousands, if not millions, of consumers. The precise number of Class members, and their addresses, is unknown to Plaintiff at this time, but can be ascertained from Defendants' records and/or retailer records. The members of the Class may be notified of the pendency of this action by mail or email, Internet postings and/or publications, and supplemented (if deemed necessary or appropriate by the Court) by published notice.

61. Predominant Common Questions (Rule 23(a)(2) and (b)(3)): The Class's claims present common questions of law and fact, and those questions predominate over any questions that may affect individual Class members. The common and legal questions include, but are not limited to, the following:

- a. Whether the marketing, advertising, packing, and labeling for the Affected Products were false, misleading, and/or deceptive;
- b. Whether Defendants violated the state consumer protection statutes alleged herein;
- c. Whether Defendants were unjustly enriched; and
- d. The nature of relief, including damages and equitable relief, to which Plaintiff and members of the Class are entitled.

62. Typicality of Claims (Rule 23(a)(3)): Plaintiff's claims are typical of the claims of the Class because Plaintiff's, like all other Class Members, purchased the one of the Affected Products, suffered damages as a result of that purchase, and seek the same relief as the proposed Class Members.

63. Adequacy of Representation (Rule 23(a)(4)): Plaintiff adequately represents the

Class because his interests do not conflict with the interests of the members of the Class, and he has retained counsel competent and experienced in complex class action and consumer litigation. Plaintiff and his counsel will fairly and adequately protect the interest of the members of the Class.

64. Superiority (Rule 23(b)(3)): A class action is superior to other available means of adjudication for this controversy. It would be impracticable for members of the Class to individually litigate their own claims against Defendants because the damages suffered by Plaintiff and the members of the Class are relatively small compared to the cost of individually litigating their claims. Individual litigation would create the potential for inconsistent judgments and delay and expenses to the court system. A class action provides an efficient means for adjudication with fewer management difficulties and comprehensive supervision by a single court.

65. Declaratory Relief (Fed. R. Civ. P. 23(b)(1) and (2)): In the alternative, this action may properly be maintained as a class action because the prosecution of separate actions by individual members of the Class would create a risk of inconsistent or varying adjudication with respect to individual Class members, which would establish incompatible standards of conduct for the Defendants; or the prosecution of separate actions by individual Class members would create a risk of adjudications with respect to individual members of the Class which would, as a practical matter, be dispositive of the interests of other members of the Class not parties to the adjudications, or substantially impair or impede their ability to protect their interests; or Defendants have acted or refused to act on grounds generally applicable to the Class, thereby making appropriate final injunctive or corresponding declaratory relief with respect to the Class as a whole.

CAUSES OF ACTION

COUNT I

**Violation of New York Deceptive Acts and Practices Law
New York General Business Law §§ 349 and 350
(On behalf of Plaintiff New York Subclass v. All Defendants)**

66. Plaintiff and the Class incorporate by reference each preceding and succeeding paragraph as though fully set forth at length herein.

67. By the acts and conduct alleged herein, Anker committed deceptive acts and practices in the State of New York by making the above alleged misrepresentations directed to consumers in New York.

68. Plaintiff and other members of the New York Class are “consumers” in accordance with New York General Business Law (“GBL”) § 349.

69. Anker’s statements concerning the safety of the Affected Products, alleged above, were advertisements in accordance with GBL § 350. Anker’s statements concerning the safety of the Affected Products, alleged above, were misleading in violation of GBL §§ 349 and 350. At all relevant times, Anker conducted trade and commerce in New York and elsewhere within the meaning of GBL § 349, and profited from the sale of the Affected Products within New York.

70. Section 349 allows a plaintiff to recover “actual damages or fifty dollars, whichever is greater.” N.Y. Gen. Bus. L. §349(h). Section 350 allows a plaintiff to recover “actual damages or five hundred dollars, whichever is greater.” Id. §350-e.

71. As a direct and proximate result of Anker’s conduct, Plaintiff and other members of the Class have suffered damages.

72. Accordingly, Plaintiff and the Class seek to enjoin the unlawful acts and practices described herein, to recover actual damages or statutory damages of fifty dollars and five hundred dollars under GBL §§ 349 and 350, respectively, whichever is greater, as well as punitive damages

and reasonable attorneys' fees and costs. On behalf of Plaintiff and the New York Subclass, Plaintiff also seeks an order entitling them and the New York Subclass to recover all monies which were acquired through Defendants' acts of fraudulent, unfair, or unlawful competition.

COUNT II
UNJUST ENRICHMENT
(On behalf of the Plaintiff and the Class)

73. Plaintiff hereby incorporates all other paragraphs of this Complaint and restates them as if fully set forth herein.

74. Plaintiff and Class members conferred benefits upon Defendants. Plaintiff and Class members paid money for Defendants' Affected Products that they would not have purchased or would not have purchased on the same terms, had they known that the Affected Products were unsafe or could be susceptible to overheating.

75. Defendants unjustly retained the benefits conferred upon by Plaintiff and Class members.

76. Defendants retained those benefits under circumstances that make it inequitable for Defendants to retain such benefits. Specifically, Defendants retained those benefits even though Defendants' Affected Products were unsafe and could not perform as advertised. If Plaintiff and Class members had known the true nature of Defendants' Affected Products, they would not have purchased the products. Plaintiff and Class members are therefore entitled to disgorgement and/or restitution as prayed for hereunder.

77. Because Defendants' retention of the non-gratuitous benefits conferred on it by Plaintiff and members of the Class is unjust and inequitable, Defendants must pay restitution to Plaintiff and members of the Class for its unjust enrichment, as ordered by the Court.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, on behalf of himself and the proposed Classes, pray for relief and judgment against Defendants as follows:

- a. Certifying the Classes pursuant to Rule 23 of the Federal Rules of Civil Procedure, appointing Plaintiff as the representative of the Class, and designating Plaintiff's counsel as Class Counsel;
- b. Awarding Plaintiff and the Classes compensatory damages;
- c. Awarding Plaintiff and the Classes appropriate relief, including but not limited to actual damages;
- d. For declaratory and equitable relief, including restitution and disgorgement;
- e. For an order enjoining Defendants from continuing to engage in the wrongful acts and practices alleged herein;
- f. Awarding Plaintiff and the Classes the costs of prosecuting this action, including expert witness fees;
- g. Awarding Plaintiff and the Classes reasonable attorneys' fees and costs as allowable by law;
- h. Entering preliminary and permanent injunctive relief against Defendant, directing Defendant to cure inadequate recall and notification processes, correct their manufacturing and marketing practices and to comply with the relevant consumer protection statutes;
- i. Awarding pre-judgment and post-judgment interest;
- j. For punitive damages; and
- k. Granting any other relief as this Court may deem just and proper.

JURY TRIAL DEMANDED

Plaintiff hereby demands a trial by jury of all claims so triable.

Dated: July 2, 2025

LEVI & KORSINSKY, LLP

By: /s/ Mark S. Reich
Mark S. Reich (MR-4166)
Michael N. Pollack (6173272)
33 Whitehall Street
New York, NY 10004
Telephone: 212-363-7500
Facsimile: 212-363-7171
Email: mreich@zlk.com
Email: mpollack@zlk.com

SULTZER & LIPARI, PLLC

Jason P. Sultzer, Esq.
Daniel Markowitz, Esq.
85 Civic Center Plaza, Suite 200
Poughkeepsie, NY 12601
Tel: (845) 483-7100
Fax: (888) 749-7747
sultzerj@thesultzerlawgroup.com
markowitzd@thesultzerlawgroup.com

Counsel for Plaintiff